

Comments

Draft Low Resolution Coring Characterization Summary Report dated July 2011 Lower Passaic River Study Area RI/FS

1. General Comment – while we are generally pleased with the revised figures in this report, there are still a number of changes EPA would suggest to how the sediment data is ultimately presented. However, at this point, these modifications can be discussed during the RI/FS technical meetings we are having and made in the draft RI report. The LRC report can stand as is, except for the remaining comments described below.

There are also two issues that we do not think were adequately addressed in the revised LRC report that, again, can be further discussed in the draft RI report rather than modified in this report:

- a. Outlier/extreme value analysis – we need to further discuss how this will be conducted and how it will be used.
 - b. Data gap analysis – two additional rounds of sediment sampling were completed since the time of this report. The results need to be evaluated together, and a formal data gap analysis must be included in the RI report. If significant data gaps are discovered, then the decision can be made whether these should be addressed during the RI/FS process, or if they can wait to be filled during a pre-design investigation.
2. To avoid any confusion, please add a sentence or two to the executive summary stating that this report was largely completed in July 2011, and it reflects work conducted as part of the original low resolution coring program effort that was completed in 2008. This current version (dated 2014) includes only minor updates to the previous version, but does not include any information about subsequent sediment sampling programs.
 3. Figure 1-3 – the legend indicates that the high-resolution cores should be marked on the figure, but they are not. Please revise to include the locations of the high-resolution cores.
 4. Page 3-3, Section 3.1.9 – this section references the Risk Assessment Data Usability and Data Evaluation Plan, which has not yet been finalized. The report should be referenced appropriately.
 5. Table 3-3, Page 3-10 – the highest concentration (Rank 1) concentration listed for 2,3,7,8-TCDD should be 13,500 ppt, not 3,500.
 6. Section 4.2.3, Data Usability, PCDDs/PCDFs – the disparity that was observed between the CPG sample results and the split sample results should be mentioned here. Although this topic is discussed in Section 2.11.4.3, some mention of the issue should be included in this section as well. As it is currently written, the reader is lead to believe that there are no issues with the dioxin/furan data set.
 7. The rest of the comments relate specifically to Figures 3-3a to n. CDM reviewed these figures and found the following discrepancies between them, the data in their database, and that included in Appendix O of

the LRC report. In the majority of cases, the database and Appendix O agreed, which implies the figures should be adjusted accordingly.

Figure 3-3.a 2,3,7,8-TCDD 0– 0.5 feet

1. Location 006; the result for sample 08A-006-C1AS is 162 ng/kg in Appendix O. The figure has a value of 255 ng/kg reported.
2. Location 066; the result for sample 08A-066-C1AS is 48.7 ng/kg in Appendix O. The figure has a value of 31.3 ng/kg reported.
3. Location 040; the result for sample 08A-040-C1AS is 1,364 ng/kg in Appendix O. The figure has a value of 1,260 ng/kg reported.

Figure 3-3.b Total TEQ 0– 0.5 feet

1. Location 066; the result for sample 08A-066-C1AS is 53.6 ng/kg in Appendix O. The figure has a value of 37.2 ng/kg reported.

Figure 3-3.c Total PCB 0.0 – 0.5 feet

1. Location 017; the result for sample 08A-017-C1AS is 1.16 mg/kg in Appendix O. The figure has a value of 1.21 mg/kg reported.
2. Location 029; the result for sample 08A-029-C1AS is 8.78 mg/kg in Appendix O. The figure has a value of 7.01 mg/kg reported.
3. Location 066; the result for sample 08A-066-C1AS is 0.111 mg/kg in Appendix O. The figure has a value of 0.114 mg/kg reported.

Figure 3-3.d High Molecular Weight PAHs 0 – 0.5 feet

1. Location 017; the result for sample 08A-017-C1AS is 12.8 mg/kg in Appendix O. The figure has a value of 14.2 mg/kg reported.
2. Location 029; the result for sample 08A-029-C1AS is 43.6 mg/kg in Appendix O. The figure has a value of 41.5 mg/kg reported.
3. Location 066; the result for sample 08A-066-C1AS is 7.62 mg/kg in Appendix O. The figure has a value of 9.16 mg/kg reported.

Figure 3-3.e Low Molecular Weight (LMW) PAHs 0 – 0.5 feet

1. Location 017; the result for sample 08A-017-C1AS is 1.96 mg/kg in Appendix O. The figure has a value of 2.15 mg/kg reported.
2. Location 029; the result for sample 08A-017-C1AS is 9.69 mg/kg in Appendix O. The figure has a value of 9.24 mg/kg reported.
3. Location 066; the result for sample 08A-017-C1AS is 1.38 mg/kg in Appendix O. The figure has a value of 2.87 mg/kg reported.

Figure 3-3.f Total DDX 0 – 0.5 feet

1. Location 017; the result for sample 08A-017-C1AS is 0.102 mg/kg in Appendix O. The CPG's figure has a value of 0.0612 mg/kg.
2. Location 066; the result for sample 08A-017-C1AS is 0.0128 mg/kg in Appendix O. The CPG's figure has a value of 0.0115 mg/kg.

Figure 3-3.g Dieldrin 0 – 0.5 feet

1. Location 017; the result for sample 08A-017-C1AS is 0.0049 mg/kg in Appendix O. The CPG's figure has a value of 0.0031 mg/kg.
2. Location 029; the result for sample 08A-029-C1AS is 0.0022 mg/kg in Appendix O. The CPG's figure has a value of 0.0024 mg/kg.
3. Location 066; the result for sample 08A-066-C1AS is 0.0013 mg/kg in Appendix O. The CPG's figure has a value of 0.0011 mg/kg.

Figure 3-3.h Total Chlordane (CPG Calc) 0 – 0.5 feet

1. Location 017; the result for sample 08A-017-C1AS is 0.0952 mg/kg in Appendix O. The CPG's figure has a value of 0.0565 mg/kg.
2. Location 029; the result for sample 08A-029-C1AS is 0.287 mg/kg in Appendix O. The CPG's figure has a value of 0.03232 mg/kg.
3. Location 066; the result for sample 08A-066-C1AS is 0.0187 mg/kg in Appendix O. The CPG's figure has a value of 0.0153 mg/kg.
4. Location 103; the result for sample 08A-103-C1AS is 0.0103 mg/kg in Appendix O. The CPG's figure has a value of 0.01077 mg/kg.

Figure 3-3.i Mercury 0 – 0.5 feet

1. Location 017; the result for sample 08A-017-C1AS is 2.53 mg/kg in Appendix O. The CPG's figure has a value of 2.69 mg/kg.
2. Location 035; the result for sample 08A-035-C1AS is 0.0385 mg/kg in Appendix O. The CPG's figure has a value of 0.0556 mg/kg.
3. Location 066; the result for sample 08A-066-C1AS is 0.112 mg/kg in Appendix O. The CPG's figure has a value of 0.124 mg/kg.
4. Location 087; the result for sample 08A-087-C1AS is 0.438 mg/kg in Appendix O. The CPG's figure has a value of 0.28 mg/kg.

Figure 3-3.l Lead 0 – 0.5 feet

1. Location 029; the result for sample 08A-029-C1AS is 228 mg/kg in Appendix O. The CPG's figure has a value of 224 mg/kg.